

EXHIBIT F

RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
30(b)(6), Confidential Michael Haken on 06/09/2020

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION
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6 IN RE: CAPITAL ONE CONSUMER)
7 DATA SECURITY BREACH) MDL No. 1:19md2915
8 LITIGATION) (AJT/JFA
9)
10 _____
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12 REPORTER'S TRANSCRIPT
13
14 VIDEOTAPED 30(b)(6) DEPOSITION OF
15 MICHAEL HAKEN
16 (Confidential Testimony)
17 Tuesday, June 9, 2020
18 Conducted Remotely via HusebyConnect
19 9:32 a.m. EST
20
21
22

23 Reported by: Rachel N. Barkume, CSR, RPR, CRR
24 Certificate No. 13657
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Page 2

1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFFS:

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30(b)(6), Confidential

Michael Haken on 06/09/2020

Page 3

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A P P E A R A N C E S

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(Continued)

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FOR THE AMAZON DEFENDANTS:

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ALSO PRESENT:

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BRIAN BUCKLEY, Associate General Counsel,
Amazon

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BRANDON BRANTLEY, Videographer

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30(b)(6), Confidential

Michael Haken on 06/09/2020

Page 53

[REDACTED]

2 transitioned to cloud computing at AWS?

3 A. We did not.

4 Q. Has AWS ever had any monitoring or testing role

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 MR. NEWBY: And John, Mr. Haken is not the

17 designated witness on that topic. Mr. Schuster will be

18 prepared to testify on that.

19 MR. YANCHUNIS: Thank you, Tyler. I wasn't

20 going to ask another question on it.

21 BY MR. YANCHUNIS:

22 Q. Did AWS have any role in helping Capital One

23 set up and maintain -- well, let me just take it step by

24 step.

25 Did AWS have any role in helping Capital One

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30(b)(6), Confidential

Michael Haken on 06/09/2020

Page 179

1 CERTIFICATE OF STENOGRAPHIC REPORTER

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4 I, RACHEL N. BARKUME, a Certified Shorthand
5 Reporter, hereby certify that the witness in the
6 foregoing deposition,

7 MICHAEL HAKEN,

8 was by me duly sworn to tell the truth, the whole truth,
9 and nothing but the truth, in the within-entitled cause;
10 that said deposition was taken at the time and place
11 therein named; that the testimony of said witness was
12 stenographically reported by me, a disinterested person,
13 and was thereafter transcribed into typewriting.

14 Pursuant to Federal Rule 30(e), transcript
15 review was requested.

16 I further certify that I am not of counsel or
17 attorney for either or any of the parties to said
18 deposition, nor in any way interested in the outcome of
19 the cause named in said caption.

20

21 DATED: June 18, 2020.

22

23



24

Rachel N. Barkume, CSR No. 13657, RPR, CRR

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MICHAEL HAKEN DEPOSITION TRANSCRIPT ERRATA

COURT: U.S. District Court for the Eastern District of Virginia

CASE NAME: In Re: Capital One Consumer Data Security Breach Litigation

MDL No. 1:19md2915 (AJT/JFA)

DATE OF DEPOSITION: June 9, 2020

INSTRUCTIONS: Please note changes by listing the page and line number in the places indicated on this sheet and listing the changes in the right-hand column. Attach additional sheets as necessary.

PLACE	READS	SHOULD READ	REASON
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Signature: s/ Michael Haken

Dated: July 21, 2020